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February 8, 2024

VIA CM/ECF

The Honorable Leonard P. Stark
United States District Court for the District of Delaware
J. Caleb Boggs Federal Building
844 N. King Street
Unit 26, Room 6124
Wilmington, DE 19801-3555

**Re: *Crystallex International Corp. v Bolivarian Republic of Venezuela*,
Misc. No. 17-151-LPS**

Dear Judge Stark:

Plaintiffs and Additional Judgment Creditors Tidewater Investment SRL and Tidewater Caribe, S.A. (“Tidewater”) and Valores Mundiales, S.L. and Consorcio Andino, S.L. (“Valores”) submit this statement in response to the Special Master’s motion of February 5, 2024 requesting amendment of certain priority arrangement procedures (D.I. 928). Tidewater and Valores respectfully ask the Court to adopt the Special Master’s alternative proposed approach according to which all Additional Judgment Creditors deliver the Required Materials to the U.S. Marshal on the same day, in the final Priority Order.¹ D.I. 928, ¶ 12.

Respectfully submitted,

/s/ Andrew S. Dupre

Andrew S. Dupre (#4621

cc: Counsel of Record (via CM/ECF & Electronic Mail)

¹ Undefined terms have the meaning given to them in the Special Master’s Motion (D.I. 928).